



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 30, 2023

BY E-MAIL

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Prince Wareham*, 22 Cr. 64 (RMB)

Dear Judge Berman:

The parties write to request an adjournment of the pretrial conference in the above-referenced matter, presently scheduled for tomorrow, Tuesday, January 31, 2023, at 12:30 p.m. The Government has extended a plea offer to the defendant that attempts to resolve both this case and the case *United States v. Prince Wareham, et al.* (11 Cr. 912), pending before Judge Abrams. Mr. Wareham requires additional time to consider that offer. The parties anticipate that within the next 30 days, they will be able to inform the Court whether Mr. Wareham intends to enter a change of plea.

The Government also respectfully requests that the time between today and the rescheduled conference be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government respectfully submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendant in a speedy trial, as the proposed exclusion will allow the Government and the defense time to continue to engage in discussions to resolve this matter pretrial. Defense counsel consents to this request.

Conference is adjourned to 3/1/23 at 12:30 pm.

Time is excluded pursuant to the Speedy Trial

Act for the reasons set forth in this letter.

SO ORDERED:

Date: 1/30/23

Richard M. Berman
Richard M. Berman, U.S.D.J.

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Respectfully submitted,

DAMIAN WILLIAMS
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Southern District of New York

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